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Attorneys for Defendant Denis Mihaqlovic Dubnikov

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DENIS MIHAQLOVIC DUBNIKOV,

Defendant.

Case No. 3:20-cr-00237-HZ-007

DEFENDANT'S MOTION FOR
TEMPORARY RELEASE OF
PASSPORT

Defendant, Denis Mihaqlovic Dubnikov, through his counsel, Joanna T. Perini-Abbott, moves this court for a temporary release of his passport on Wednesday January 25, 2023, from approximately noon until 5pm. Mr. Dubnikov requires his passport as proof of identification to have certain documents notarized. Undersigned counsel or another attorney from her office will remain with Mr. Dubnikov and his passport during the time it is out of pretrial's custody and will return it before close of business on Wednesday January 25. Undersigned counsel has conferred with the government on this request, and they do not oppose it.

DATED January 20, 2023

Respectfully submitted,

s/ Joanna T. Perini-Abbott

ANGELI LAW GROUP LLC
JOANNA T. PERINI-ABBOTT

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*Attorneys for Defendant Denis Mihaqlovic
Dubnikov*